

Robert B. Stanfield, ScD
29 Ledge Lane
Pipersville, PA 18947
Phone 610-294-9884

May 24, 1996
Revere Chemical Superfund Site

Ruth Scharr, Remedial Project Manager
US EPA Region III, (3HW21)
841 Chestnut Building
Philadelphia, PA 19107

Dear Ms Scharr,

The U.S. Environmental Protection Agency (EPA) has proposed a plan for the Revere Chemical Site in Bucks County. I find that this plan does not take all the reasonable steps possible to prevent future hazardous impact of this site on residents in the area.

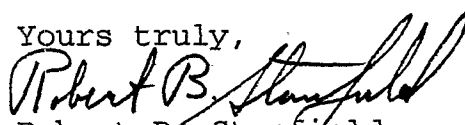
I do recognize, that for the present, the heavy metals contamination at the site do not appear to be entering the surface and ground water. Further, there are no practical means of removing this contamination. However, the metals levels in the soil are high enough to poison any floral growth. The EPA proposes capping the contaminated area of the site, to deed restrict this area and return control of the site to the owners. Considering the past record of the owners' disregard of the law and their probable intended use of the site as a quarry, a simple deed restriction of the contaminated area would seem to be a toothless safeguard.

The EPA proposal cites "ground water flow in the Lockatong Formation indicates restricted ground water movement through small fractures in bedrock" as a justification for their position. Quarrying would destroy this barrier dangerously close to the contamination. The activity related to quarrying, disposal of overburden, truck activity, blasting, disposal of quarry waste water, etc, could all too easily intrude onto the contaminated area.

While the metals are currently "trapped" by the soil, any future change in the environment that could easily change the chemistry that holds these contaminants and release them to the environment. For example, any change in soil acidity, through acid rain, action of flora or local human activity, would change the soil adsorptive retention capacity for these contaminants. This is a known phenomena. Any human activity that might disturb the area could cause erosion that would contaminate the Rapp Creek.

I would recommend that the entire property be condemned and deeded to an entity that would preclude future human activity on the site in perpetuity. Returning the site to the current owners, is highly irresponsible considering the record of the owners and their intended use of the property.

Yours truly,


Robert B. Stanfield

AR500079